

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**CENTELL COLONZO MCNEIL,**  
Plaintiff,

vs

CASE NO. 3:15-cv-00751

**BIAGGI PRODUCTIONS, LLC,**

**and**

**JUAN A. DAVILA,**  
Defendants.

**PLAINTIFF'S RULE 26(a) DISCLOSURES**

Comes now, Plaintiff, by counsel and pursuant to the Federal Rules of Civil Procedure hereby makes his Rule 26(a) Disclosures. Plaintiff reserves the right to amend and/or supplement these disclosures pursuant to FRCP 26(e). By listing witnesses and documents, Plaintiff does not waive his right to assert any applicable privilege or protection at an appropriate time or to seal appropriate information under a protective order.

**(A)(i) Individuals Likely to Have Discoverable Information**

1. Centell McNeil, Police Officer Richmond Police Department, 1<sup>st</sup> Precinct  
c/o Thomas H. Roberts & Associates, P.C.  
105 S 1<sup>st</sup> Street  
Richmond, VA 23219  
804-783-2000

Knowledge of Defendants' defamatory statements, including Defendants' use of social media to publish false statements about Mr. McNeil. Knowledge of Defendants' conduct during December 29, 2014 interactions via FaceTime, e-mail, telephone, text message. Knowledge of his own conduct regarding the same. Knowledge of Plaintiff's damages.

2. Crystal McNeil, 9329 Horizon Road, Richmond, VA 23225; 804-747-0859

Knowledge of Plaintiff's economic and non-economic damages. Knowledge of Defendants' defamatory statements.

3. Christina Bartley, Internal Affairs Detective, Richmond Police Department  
400 E Grace Street  
Richmond, VA 23219  
804-646-6816

Knowledge of Defendants' defamatory statements and communications between Defendants and Richmond Police Department. Knowledge of Plaintiff's conduct and Plaintiff's statements about the defamation. Knowledge of the facts and evidence pertaining to the December 29, 2014 interactions between Plaintiff and Defendant. Knowledge of the internal investigation of Mr. McNeil and the results thereof, including the disciplinary proceedings.

4. Antonio "Biaggi" Davila  
c/o Marrs & Henry, P.C.

Knowledge of December 29, 2014 interactions with Plaintiff and his own conduct thereafter. Knowledge of social media postings pertaining to Plaintiff and Plaintiff's reputation. Knowledge of Defendant Biaggi Production LLC's business profits/activity after social media posts pertaining to Plaintiff.

5. Custodian of Records, Richmond Police Department  
400 E Grace Street  
Richmond, VA 23219  
804-646-5100

Knowledge of the authenticity of the documents and capable of establishing foundation of documents for purposes of hearsay exceptions.

**(A)(ii) Copies of Documents to Support Claims**

Please see bates stamped documents CM000001-CM000241 sent via electronic mail. Please also see the FaceTime recording in the possession of the Defendant.

**(A)(iii) Computation of Damages**

Economic damages: estimated \$25,000.00

Centell McNeil (DOB ) is 31 years old with approximately 7 years of service as a Richmond City Police Officer. His current salary is approximately \$44,685.99. He was terminated from employment from August 2016 until May/June 2017 due to the allegations made by the Defendants stemming from the December 29, 2014 FaceTime call.

Mr. McNeil grieved the disciplinary action from Richmond Police Department and incurred approximately \$25,000 in attorneys' fees in the grievance action against the City of Richmond. The attorney fees were charged on an hourly basis.

